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Jávea, 30 March 2011

Madame Fiona M. Alexander  
Associate Administrator  
Office of International Affairs  
NTIA, US Department of Commerce  
1401 Constitution Avenue, N.W.  
Room 4701  
Washington DC 20230, USA

<[IANAFunctions@ntia.doc.gov](mailto:IANAFunctions@ntia.doc.gov)>

Dear Madame Alexander:

**Re: Notice of Inquiry on the IANA Functions.**

Allow me to respond to certain aspects of your current Notice of Inquiry. I am writing in my personal capacity, and limit my comments to those aspects with which I have had some personal experience.

1. **Background:** Prior to the constitution of ICANN in 1998, it was my privilege to participate in the NTIA Green paper/White paper process, at the time representing the European Commission.

In addition to discussions with the responsible officials in the White House and NTIA, the Commission engaged in consultations with the European and international Internet Community.

Suffice to say for present purposes, that one principle outcome of those consultations was a broad agreement that the future ICANN organisation should be based on the then IANA entity. Although the Internet has naturally moved on meanwhile, it is necessary to recall that:

- the rationale for ICANN to become a Californian Not-For-Profit corporation was entirely related to the location of IANA at the time, and
- that decision was not an unilateral United States' matter, but the outcome of consultations among the international Internet community and governments.

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This issue was also discussed among participants to the International Forum for the White Paper (IFWP), where – as a result of the above considerations – other options for the creation of ICANN (aka “NewCorp”) were not considered further.

2. **The multistakeholder dimension:** The IANA functions relate to multiple stakeholder interests and responsibilities. Although it may be conceivable, from a technical point of view, that these functions might be dissociated from ICANN or indeed severed among distinct operators, this approach would not be viable from a political and economic point of view.

Multistakeholder input is necessary for the responsible and responsive implementation of the IANA functions. However, effective multistakeholder participation and oversight is – in the aggregate - time consuming and costly. With respect to the organisation and management of the Internet, that can best be done in a single global forum. Furthermore, certain aspects of the IANA functions are particularly sensitive for national governments. Thus, GAC has in the past expressed its interest in several aspects of the IANA functions, and no doubt will continue to do so in the future.

Consequently in future the IANA functions should take place within the context of a single multistakeholder organisation evolving consistently with the Affirmation of Commitments and related policies and activities.

3. **Other questions in the NOI:** Most of the issues raised by the NOI are not specific to a particular contract or agreement. Optimal solutions regarding root zone management, transparency, security etc. can be identified and implemented. They will evolve over time in response to technological progress and stakeholder input. They are already being addressed by other responses to the NOI from the stakeholders concerned.

There remain two small queries on my part:

- it is not clear to me that ICANN/IANA needs to maintain its position as Registry for the .INT domain. I suspect that a proposal to re-delegate this TLD would be accepted by the Internet community, provided that the new Registry was a neutral, competent, global entity responsive to the interests and concerns of the international Registrants in .INT

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- finally, I would query the rôle of the manager of the “A” Root Server. Normally, and in principle, one would not confide custody of a critical resource to the legacy dominant operator, irrespective of the contractual conditions in place.

\* \* \*

Needless to repeat that these comments are made in my personal capacity, without prejudice to the position and eventual submissions of any entity with which I am or have been associated.

Yours sincerely,

-/- signed -/-

Christopher Wilkinson.